



Eric Gonzalez
District Attorney

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: JASON FILORAMO

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure #1:

ON JUNE 24, 2014, POLICE OFFICER JASON FILORAMO, AND DETECTIVE ALEX PASYNKOV, EACH SIGNED A SUPPORTING DEPOSITION CONCERNING THE ARREST OF A CERTAIN INDIVIDUAL. ANOTHER POLICE OFFICER THEN RELIED ON THE SWORN STATEMENTS IN THESE TWO DEPOSITIONS TO PROVIDE NECESSARY INFORMATION TO CHARGE THE INDIVIDUAL IN A CRIMINAL COMPLAINT (KINGS COUNTY DOCKET NUMBER 2014KN047146) WITH ONE COUNT OF CRIMINAL POSSESSION OF MARIHUANA IN THE FIFTH DEGREE AND TWO COUNTS OF UNLAWFUL POSSESSION OF MARIHUANA.

P.O. FILORAMO, IN HIS SUPPORTING DEPOSITION, MADE THE SWORN STATEMENT THAT ON JUNE 24, 2014, HE HAD OBSERVED THE SUBSEQUENTLY-CHARGED INDIVIDUAL ON THE SIDEWALK IN FRONT OF 911 EAST 40TH STREET, BROOKLYN, WITH A BURNING MARIHUANA CIGARETTE IN HIS LEFT HAND.

DET. PASYNKOV, IN HIS SUPPORTING DEPOSITION, MADE THE SWORN STATEMENT THAT ON JUNE 24, 2014, HE HAD RECOVERED A MARIHUANA CIGARETTE FROM THE GROUND WHERE HE HAD OBSERVED THE SUBSEQUENTLY-CHARGED INDIVIDUAL DROP IT.

ON FEBRUARY 27, 2015, P.O. FILORAMO SPOKE WITH THE ADA ASSIGNED TO PROSECUTE THE ABOVE-NOTED CASE (DKT. NO. 2014KN047146). P.O. FILORAMO EXPLAINED THAT ON JUNE 24, 2014, HE AND HIS PARTNER, DET. PASYNKOV, WHILE DRIVING IN A VEHICLE WITH THE WINDOWS DOWN, HAD SMELLED MARIHUANA. P.O. FILORAMO HAD OBSERVED THE SUBSEQUENTLY-CHARGED INDIVIDUAL STANDING ON THE SIDEWALK NEAR A PARKED CAR AND HAD SEEN THE INDIVIDUAL BEND DOWN. P.O. FILORAMO SAID THAT HE AND HIS PARTNER HAD GOTTEN OUT OF THEIR VEHICLE AND HAD APPROACHED THE INDIVIDUAL. P.O. FILORAMO HAD OBSERVED A LIT MARIHUANA CIGARETTE ON THE GROUND NEXT TO THE INDIVIDUAL. P.O. FILORAMO STATED THAT, CONTRARY TO HIS PREVIOUS SWORN STATEMENT, HE HAD NOT SEEN A BURNING MARIHUANA CIGARETTE IN THE INDIVIDUAL'S HAND.

ON MARCH 24, 2015, DET. PASYNKOV SPOKE WITH THE ADA ASSIGNED TO PROSECUTE THE ABOVE-NOTED CASE (DKT. NO. 2014KN047146). DET. PASYNKOV EXPLAINED THAT ON JUNE 24, 2014, HE AND HIS PARTNER, P.O. FILORAMO, WHILE DRIVING IN A VEHICLE WITH THE WINDOWS DOWN, HAD SMELLED MARIHUANA. HE HAD OBSERVED THE SUBSEQUENTLY-CHARGED INDIVIDUAL STANDING ON THE SIDEWALK NEAR A PARKED CAR AND HAD SEEN THE INDIVIDUAL BEND DOWN. DET. PASYNKOV SAID THAT HE AND HIS PARTNER HAD GOTTEN OUT OF THEIR VEHICLE AND HAD APPROACHED THE INDIVIDUAL. DET. PASYNKOV HAD OBSERVED A LIT MARIHUANA CIGARETTE ON THE GROUND ABOUT SIX INCHES FROM THE INDIVIDUAL, AND DET. PASYNKOV RECOVERED THAT CIGARETTE FROM THE GROUND. DET. PASYNKOV STATED THAT, CONTRARY TO HIS PREVIOUS SWORN STATEMENT, HE HAD NOT SEEN THE INDIVIDUAL DROP A MARIHUANA CIGARETTE TO THE GROUND. ON APRIL 1, 2015, THE PEOPLE DISMISSED THE ABOVE-NOTED CASE.

Disclosure # 2:

MOS FILORAMO IS A NAMED DEFENDANT IN THE FOLLOWING CIVIL ACTION(S):

1. HARVEY FRENCH AND LEONARD LONDON V. CITY OF NEW YORK, ET AL., 13-CV-6440 FILED IN THE EASTERN DISTRICT

Disclosure # 3:

THE NYPD ENTERED A DISPOSITION OF OTHER MISCONDUCT NOTED, DATED 8/5/14, AGAINST MOS FILORAMO:

1. REPORT INCOMPLETE/INACCURATE
ACTION TAKEN: 'A' CD ISSUED
CASE CLOSED ON 11/27/15

Disclosure # 4:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 10/15/18, AGAINST MOS FILORAMO:

1. MEMOBOOK INCOMPLETE/IMPROPER
ACTION TAKEN: VERBAL INSTRUCTIONS
CASE CLOSED ON 3/8/19

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:

Disclosure # 5:

CCRB CASE: 201704946

REPORT DATE: 06/14/2017

INCIDENT DATE: 06/14/2017

OTHER MISCONDUCT NOTED:

1. OMN - FAILURE TO PREPARE A MEMO BOOK ENTRY

Eric Gonzalez
District Attorney
Kings County